

PRE-APPEAL BRIEF REQUEST FOR REVIEW		Docket Number (Optional)
Certificate of Transmission under 37 CFR 1.8 I hereby certify that this correspondence is being _____ facsimile transmitted or <u> X </u> e-filed to the United States Patent and Trademark Office - Mail Stop AF. on <u> March 8, 2007 </u> Signature <u> /Stacie Herrera/ </u> Typed or printed name: Stacie Herrera		Application Number <u> 10/682571 </u> First Named Inventor <u> BEDWELL, RYAN D. </u> Art Unit <u> 2111 </u> Filed <u> October 9, 2003 </u> Examiner <u> Nimesh G. Patel </u>
Applicant request review of the final rejection in the above identified application. No amendments are being filed with this request. This request is being filed with a notice of appeal. The review is requested for the reason(s) stated on the attached sheet(s). Note: No more than five (5) pages may be provided. I am the ☐ applicant/inventor. ☐ assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96) ☒ attorney or agent of record. Registration number: 35,896 ☐ attorney or agent acting under 37 CFR 1.34 Registration number if acting under 37 CFR 1.34 _____		
		 Signature <u> HILL, SUSAN C. </u> Typed or printed name <u> (512) 996-6839 </u> Telephone number <u> 3/8/07 </u> Date
NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.		

☒ *Total of 1 forms are submitted

The collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality if governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT(S) BEDWELL, RYAN D. GROUP ART UNIT: 2111
APPLN. NO.: 10/682571 EXAMINER: Nimesh G. Patel
FILED: October 9, 2003
TITLE: COMMUNICATION STEERING FOR USE IN A MULTI-MASTER
 SHARED RESOURCE SYSTEM

Certificate of Submission

I hereby certify that this correspondence is being submitted to the USPTO, Alexandria, VA.

- ☐ Addressed per C.F.R. § 1.1(a) and deposited with the United States Postal Service with sufficient postage as first class mail.
- ☐ Facsimile transmitted in accordance with C.F.R. § 1.6(d).
- ☒ Submitted electronically via EFS in accordance with "Legal Framework for EFS Web".

March 8, 2007

Date of Submission

/Stacie Herrera/

Signature

Stacie Herrera

Printed Name of Person Signing Certificate

COMMENTS IN SUPPORT OF PRE-APPEAL CONFERENCE

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

Responsive to the Final Office Action dated December 14, 2006, and Examiner's comments with regard thereto, please enter the following comments in the above-entitled application, without prejudice or disclaimer.

If Applicant has overlooked any additional fees, or if any overpayment has been made, the Commissioner is hereby authorized to credit or debit Deposit Account 503079, Freescale Semiconductor, Inc.

REMARKS

Claim Rejections under Watkins – 35 USC 102(e)

Claims 25-36 are rejected under 35 USC 102(e) as being anticipated by Watkins et al. (US 2003/0182492). Claim 25 expressly states “additional signal steering logic which establishes a communication path between the resource and at least one of the first bus master and the second bus master, wherein the communication path is used to transfer at least one additional signal between the resource and the at least one of the first bus master and the second bus master, and wherein the communication path is determined by the resource”. Claim 34 also expressly states “wherein the communication path is determined by the resource”. Watkins does not teach or even suggest that the communication path is determined by the resource (per the Examiner, device 30 in FIG. 7 of Watkins teaches the resource). In fact, Watkins teaches away from this by teaching that the bridge 12, not device 30, determines ownership and thus the communication path. (See Watkins, paragraphs [0014], [0016], [0017], [0023], [0025], and [0111].)

One advantage of the claimed invention over Watkins is that a direct communication can be made (see FIG. 1, conductors 101, 102) between the resource 100 and the bus masters 12, 14. Referring to FIG. 7 of Watkins, no such direct communications between device 30 and processing sets 14 and 16 can take place in Watkins. Watkins must use a bridge 12 to act as an intermediate interface and route all communications between device 30 and processing sets 14 and 16. Any time circuitry is added (e.g. bridge 12) between communicating blocks of circuitry (e.g. between the device 30 and processing sets 14 and 16), one of the negative effects that may result is that the intermediate circuitry (e.g. bridge 12) can act to slow the actual communication. By removing the need for bridge 12, the claimed invention may operate more efficiently.

The Examiner’s only response to Applicants argument above is as follows.

“Watkins does disclose the communication path being determined by the resource (Paragraphs 71-72; The slot defines the ownership of the slot and therefore determines the communication path.).” (See Office Action dated 12/14/2006, last line of page 4 and lines 1-2 of page 5.)

Applicants have read Paragraphs 71-72 of Watkins, as indicated by the Examiner’s response. Applicants respectfully assert that Watkins teaches that the slot response register

(SSR) 118 in bridge 12 defines the ownership of the slots, and therefore determines the communication path. Thus, Watkins teaches that bridge 12, not device 30, determines the communication path. To support this assertion, Applicants refer to Paragraph [0071] cited by the Examiner. Paragraph [0071] teaches “each of the slots on the device bus 22 has a slot response register (SSR) 118 that contains bits defining the ownership of the slots”. (Watkins, paragraph [0071].) The SSR 118 that contains bits defining the ownership of the slots is illustrated in FIG. 3 of Watkins as part of block 110. Block 110 is illustrated in FIG. 2 as part of block 12. And, block 12 is illustrated in FIGS. 1 and 7 as bridge 12 in Watkins. Thus, per Watkins, the slot response register (SSR) 118 that contains bits defining the ownership of the slots is in bridge 12.

As a result, Watkins does not teach or even suggest that the communication path is determined by the resource (per the Examiner, device 30 in FIG. 7 of Watkins teaches the resource). In fact, Watkins teaches away from this by teaching that the bridge 12, not device 30, determines ownership and thus the communication path. (See Watkins, paragraphs [0014], [0016], [0017], [0023], [0025], [0071], [0072], and [0111].)

The dependent claims are allowable for at least the reasons given above for the independent claims.

The Office Action contains numerous statements characterizing the claims, the Specification, and the prior art. Regardless of whether such statements were addressed by Applicants, Applicants refuse to subscribe to any of these statements, unless expressly indicated by Applicants.

Applicants believe the application is in condition for allowance which action is respectfully solicited. Please contact Susan C. Hill if there are any issues regarding this communication or the current Application.

Respectfully submitted,

SEND CORRESPONDENCE TO:

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